

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-MJ-03119-Torres

UNITED STATES OF AMERICA

v.

EDWARD CORDOVEZ,

Defendant.

_____ /

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shanick M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
4. Did this matter involve the participation of or consultation now Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: /s/ Jacob Koffsky
Jacob Koffsky
Assistant United States Attorney
Florida Bar No.: 1018115
99 NE 4th Street
Miami, FL 33132
(305) 961-9386
Jacob.Koffsky@usdoj.gov

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

Edward Cordovez,

Case No. 24-MJ-03119-Torres

*Defendant.***CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 24, 2023, and June 6, 2024, in the county of Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 1466A

Distribution of obscene visual representations of the sexual abuse of children

18 U.S.C. § 2252(a)(4)(B)

Possession of visual depictions involving the sexual exploitation of minors

This criminal complaint is based on these facts:

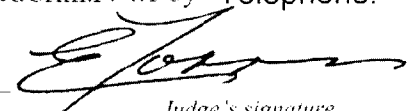
SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.


 Complainant's signature ID#28625
 Nicole Harris-Correa, Special Agent, FBI
 Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Telephone.

Date: June 6, 2024


 Judge's signature

City and state: Miami, Florida

Honorable Edwin G. Torres, United States Chief Magistrate Judge
 Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nicole D. Harris-Correa, having been duly sworn, hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since March 2019. I am assigned to the FBI Child Exploitation and Human Tracking Squad in the FBI's Miami Field Office, which targets individuals involved in the online sexual exploitation of children. As part of my duties, I investigate crimes involving the sexual exploitation of minors, including sex trafficking, child pornography, and enticement violations. I have received training on the proper investigative techniques for these violations, including the use of surveillance techniques, undercover activities, and the application and execution of arrest and search warrants. I have conducted and assisted in numerous child exploitation investigations. I have also executed search warrants that have led to seizures of child pornography.

2. I am an investigative or law enforcement officer of the United States within the meaning of Sections 2510(7) of Title 18, United States Code. That is, I am an officer of I am an officer of the United States, who is empowered by law to conduct investigations of and make arrests for, offenses enumerated in Title 18, United States Code, Sections 2422, 2423, 2251 and 2252, et seq.

3. This affidavit is made in support of a criminal complaint against EDWARD CORDOVEZ ("CORDOVEZ") for distribution of obscene visual representations of the sexual abuse of children, in violation of 18 U.S.C. §§ 1466A(a) and 2252A(b)(1), and for possession of visual depictions involving the sexual exploitations of minors, in violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2). This affidavit is based upon my personal knowledge of the events set forth herein, as well as information provided to me by other law enforcement personnel and other

sources of information. Because this affidavit is being submitted for the limited purpose of filing supporting a criminal complaint, I have not included every fact known to me or other law enforcement personnel concerning this investigation but have set forth only those facts necessary to establish probable cause.

SUMMARY OF THE INVESTIGATION

4. This investigation began in June 2023, when law enforcement identified an account with Coinbase, Inc.,¹ which, it appeared, was being used to purchase child pornography (“Target Coinbase Account”). More specifically, on or about June 17, 2023, law enforcement identified that the Target Coinbase Account attempted to send \$20 worth of bitcoin currency to a recipient account that had been identified—and blacklisted—by the Internet Watch Foundation (“IWF”)² as an account that sells child pornography with as young as toddler-aged minors engaging in sexually explicit conduct. Coinbase stopped the transaction from going through.

5. Law enforcement traced the Target Coinbase Account to CORDOVEZ, ensuring that CORDOVEZ owned and operated the account by verifying his personal identifiable information (e.g., his social security number, his home address, and his phone number). Law enforcement learned that the Target Coinbase Account was created on December 9, 2017, and Coinbase—in providing law enforcement with information about the Target Coinbase Account—provided images of CORDOVEZ’s Florida driver’s license. In addition, law enforcement

¹ “Coinbase, Inc.” according to their website is an American Public traded company that operates a cryptocurrency exchange platform. It is the largest cryptocurrency exchange in the United States in terms of trading volume.

² IWF is a U.K.-based global charity that aims to minimize the availability of online sexual abuse content, specifically child sexual abuse images and videos hosted anywhere in the world.

investigated the IP address that was used to create the Target Coinbase Account, which also traced back to CORDOVEZ and his home address.

6. On or about March 28, 2024, the National Center for Missing and Exploited Children (“NCMEC”) received a CyberTipline report from Reddit, Inc., (“Reddit”), which reported a Reddit user having a conversation about wanting to have sex with his minor daughter.³ The Reddit user had a screen/username “Dear_Road6737,” which associates with an email address that belongs to CORDOVEZ and with an IP address that traces back to CORDOVEZ’s residence. The conversation took place on or between May 23, 2023, and May 25, 2023. NCMEC provided to law enforcement content of the conversation—between Reddit user “Dear_Road6737” and another Reddit user “Ti_k3r”—which is pasted below:

| Sender | Message |
|---------------|---|
| Dear_Road6737 | What's up? Am I wrong to want to fuck my daughter? |
| Dear_Road6737 | [Sent Image of Minor Female] |
| Ti_k3r | Ayo! Not in the slightest she hell pretty and I would definitely want to fuck her too of I was in a class with her. |
| Ti_k3r | How old is she? |
| Dear_Road6737 | She's 14 |
| Ti_k3r | Mhm you little perv |
| Ti_k3r | But I don't blame you |
| Ti_k3r | Btw you hot af too |
| Ti_k3r | I guess she must have inherited it from you |
| Dear_Road6737 | Thanks man! Yeah she definitely has some of my traits lol. |
| Ti_k3r | Latina mother? |
| Dear_Road6737 | Yupp and she holds her own lol |
| Dear_Road6737 | [Sent Image of Adult Female] |
| Dear_Road6737 | She's 28, we had our daughter when my wife was 14 |

³ NCMEC, a private, nonprofit corporation, was created to help find missing children, reduce child sexual exploitation, and prevent child victimization. It began the CyberTipline in 1998 to serve as the online clearinghouse for tips and leads relating to instances of child sexual exploitation.

7. In a continuation of the same conversation, Reddit users Dear_Road6737 and Ti_k3r had the following conversation:

| Sender | Message |
|---------------|--|
| Ti_k3r | Is she up to be fucked by someone else? |
| Ti_k3r | Well if not she can be raped too |
| Ti_k3r | Right in front of you |
| Dear_Road6737 | She has her slutty side. She regularly fucks other guys. Sometimes I'll watch if they are somewhat attractive. |
| Dear_Road6737 | What I really want to see is my daughter get fucked. |
| Dear_Road6737 | Well I mean I rather fuck her lol but at the least watching her get plowed would be so hot. |
| Ti_k3r | Mhmmm yes I want to take her virginity. I would fuck her so hard. Or we can join on her |
| Ti_k3r | Dp on a 14 old would be awesome |
| Ti_k3r | The size difference |
| Ti_k3r | [Sent image of adult male penis] |
| Ti_k3r | Made me soo horny |
| Dear_Road6737 | Her holes would be so tight. |
| Dear_Road6737 | That's a nice cock dude. I would happily watch you take them both. |
| Ti_k3r | Btw let me tell you I am 17 and I am really close to fucking a 13 year old girl from our school |
| Ti_k3r | She is super into me |
| Ti_k3r | I just want to see her scream |
| Dear_Road6737 | Dude you have to get that quick |
| Ti_k3r | Right and I think she doesn't even care that I have a gf |
| Dear_Road6737 | Most women don't if they want you lol |
| Ti_k3r | You think? |
| Dear_Road6737 | I'm telling you 100% |
| Dear_Road6737 | I'd go for it |
| Ti_k3r | Ot would be wild to have my own 12 year old private fuckdoll |
| Ti_k3r | Or 13 |
| Ti_k3r | I don't know exactly |
| Dear_Road6737 | My wife was 11 and I was 18 when we met. I was a volunteer tutor at her school. |
| Ti_k3r | Ok that's super hot |
| Ti_k3r | Fuck I want to be you |

| | |
|---------------|--|
| Dear_Road6737 | It took me about a year to groom her into having sex |
|---------------|--|

8. Further investigation revealed that Reddit user “Dear_Road6737” was reported to have uploaded one file of child pornography to Reddit approximately three times within a minute, on or about May 26, 2023. The file was a photo of a female toddler, approximately 3–4 years old, bent over on her knees with her legs open exposing her vagina and anus. Further investigation also revealed:

a. that Reddit user “Dear_Road6737” had various chat conversations—either group chats or direct messages—with approximately eighteen (18) Reddit users about having sex with his minor daughter, on or between May 16, 2023, and May 30, 2023;

b. that the email and IP addresses associated with Reddit user “Dear_Road6737”—both of which, again, trace back to CORDOVEZ—also associate with an additional Reddit account called “Daughterslove_20230402”;

c. that, on or about May 23, 2023, Reddit user “Dear_Road6737” and another Reddit user, Middle-Gift3199, had the following conversation:

| Sender | Message |
|-----------------|--|
| Dear_Road6737 | I had my daughter when I was 14. The girl I got pregnant at the time was 11. She give birth at 12 though |
| Middle-Gift3199 | Dudes I wanna live ur life |
| Middle-Gift3199 | Fukcing a 11 year old |
| Middle-Gift3199 | Ahh |
| Middle-Gift3199 | So got |
| Middle-Gift3199 | I hot |
| Middle-Gift3199 | Must have been fun |
| Dear_Road6737 | I wish I would have been able to fuck my daughter but mom was always around |
| Dear_Road6737 | Cock blocking that tiny little ass and pussy |
| Middle-Gift3199 | Annoying ass mom |

| | |
|-----------------|---|
| Middle-Gift3199 | U should've made some reason to be alone with her and quickly finish using her mouth |
| Dear_Road6737 | Oh I used to jerk off on her all the time lol |
| Middle-Gift3199 | And cum on her? |
| Middle-Gift3199 | Why not use her mouth |
| Middle-Gift3199 | Ever kissed her? |
| Dear_Road6737 | Too young in the beginning. First time she was 6 months old. I would cum over her face but cum could hurt the baby. So I had to wait till she was 1 year 2 months to cum in her mouth |
| Dear_Road6737 | Wait* |
| Middle-Gift3199 | Ur so lucky |
| Middle-Gift3199 | Dw I will do the same |
| Dear_Road6737 | I was coming in her mouth till she was Like 3. I had to stop so she wouldn't tell her mom |
| Dear_Road6737 | But I cum in her food all the time |
| Dear_Road6737 | https://i.redd.it/tr4081vwcolb1.jpeg (Image of female young teenager clothed) |
| Middle-Gift3199 | I wish I was ur son so that we could fuck ur daughter together |

d. and that, on or about May 24, 2023, Reddit user “Dear_Road6737,” in a group chat, sent approximately nine Reddit jpeg links. Review of these links appear to be artificial intelligence (“AI”) and cartoon generated images of child pornography, which can be described as follows:

- <https://i.redd.it/mor8a54quqlb1.jpeg>: Adult male in bathtub penetrating baby
- <https://i.redd.it/e0rtknbquqlb1.jpeg>: Baby pushed on bed face down being penetrated by adult penis
- <https://i.redd.it/xubq9viquqlb1.jpeg>: Baby laying in crib with writing "free to use" on baby's chest and three male penises ejaculating onto baby
- <https://i.redd.it/txw3haquqlb1.jpeg>: Toddler being anally penetrated by adult male penis and mouth on adult penis
- <https://i.redd.it/ch3j434ruqlb1.jpeg>: Toddler with bikini in mouth being vaginally penetrated by adult male penis in car seat
- <https://i.redd.it/dmnaoraruqlb1.jpeg>: Prepubescent female being choked by an adult male while another male places a penis in her face
- <https://i.redd.it/lgf2alceruqlb1.jpeg>: Female toddler without underwear, flexing arm muscles

- <https://i.redd.it/s3scfniruqlb1.jpeg>: Adult male anally penetrating toddler female

9. On or about May 30, 2024, law enforcement conducted surveillance at CORDOVEZ's residence and observed him exiting it through the front door and entering a White Chevy Equinox bearing temporary Florida tag DQG717 that was parked in the driveway. According to the Florida's Driver and Vehicle Information Database, the Equinox is registered to a company called TekOrder, Inc. A review of Florida's Department of Economic Opportunity Wage Records revealed that TekOrder, Inc. is listed as CORDOVEZ's employer.

10. On June 4, 2024, based in part on the information set forth above, a warrant to search CORDOVEZ's residence and any containers found on his person or in any bags or containers in his possession, and including any computers found therein any such bag or container or thereon his person," was issued. Law enforcement executed the search warrant on June 6, 2024, and encountered CORDOVEZ while he was heading towards his Chevy Equinox vehicle, which was parked in his driveway. Law enforcement stopped CORDOVEZ, searched his person, seized an Android cell phone that was found on CORDOVEZ, and then detained him in a police vehicle while searching CORDOVEZ's residence. No devices were seized from CORDOVEZ's residence.

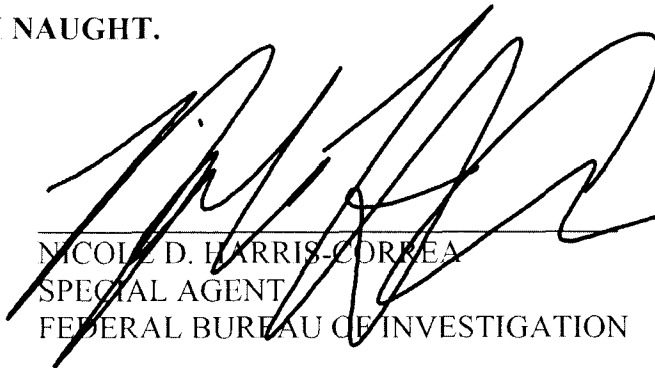
11. Law enforcement then conducted an audio-recorded interview of CORDOVEZ, who waived his *Miranda* rights and spoke to law enforcement. When law enforcement asked CORDOVEZ to show them where child pornography was stored on his Android cell phone, CORDOVEZ identified an application that outwardly looked like a calculator, typed in a password, and accessed repositories of child pornography that contained thousands of child pornography images and thousands of child pornography videos. Dozens of the videos included visual depictions of prepubescent minors—indeed, infants—engaged in sexually explicit conduct.

CORDOVEZ admitted to distributing some of these images and videos to others, through the internet. Additionally, CORDOVEZ confirmed his email address to be the email address associated with the "Dear_Road6737" Reddit user and admitted to having Reddit conversations about engaging in sexually explicit conduct with his alleged daughter. CORDOVEZ denied having engaged in such conduct with his alleged daughter but admitted to having thoughts of doing so.

CONCLUSION

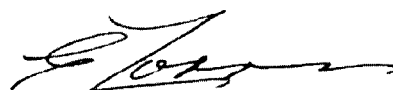
12. Based upon the information provided above, I respectfully submit that there is probable cause to believe that CORDOVEZ has committed violations of distribution of obscene visual representations of the sexual abuse of children, pursuant to 18 U.S.C. §§ 1466A(a) and 2252A(b)(1), and of possession of visual depictions involving the sexual exploitations of minors, pursuant to 18 U.S.C. § 2252(a)(4)(B) and (b)(2). Accordingly, I respectfully request that this Court authorize a criminal complaint to be filed against CORDOVEZ.

FURTHER AFFIANT SAYETH NAUGHT.



NICOLE D. HARRIS-CORREA
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1
by Telephone this 6th day of



HONORABLE EDWIN G. TORRES
UNITED STATES CHIEF MAGISTRATE JUDGE